

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	In Chapter 11
)	Case No. 18 B 01228
MADISON-LARAMIE SELF STORAGE, L.L.C.,)	Honorable Donald R. Cassling
)	Motion Date: December 18, 2018
Debtor.)	Motion Time: 10:00 a.m.

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on **Tuesday, December 18, 2018 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Donald R. Cassling in his usual Courtroom No. 619 in the Dirksen Federal Building at 219 South Dearborn Street, Chicago, Illinois, or whomever may be sitting in his place and stead, and then and there present **Motion for Entry of Final Decree**, a copy of which is attached hereto and hereby served upon you.

Miriam R. Stein (ARDC #6238163)
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CERTIFICATE OF SERVICE

Miriam R. Stein, an attorney, hereby certifies that on December 11, 2018, she caused a true and correct copy of the foregoing Motion for Entry of Final Decree to be filed with the Clerk of the Bankruptcy Court using the CM/ECF system, which will electronically notify the parties listed with the Court. For all parties not registered with the Court's CM/ECF system, a true and correct copy was served on December 11, 2018 via First Class Mail with postage prepaid from 30 S. Wacker Dr., Chicago, IL 60606.

By: /s/Miriam R. Stein

SERVICE LIST

Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 S. Dearborn St., Room 873
Chicago, IL 60604
Via CM/ECF

City of Chicago - Dept. of Finance
Water Division
P.O. Box 6330
Chicago, IL 60680
Via First Class Mail

Cook County Collector
118 North Clark Street
Suite 112
Chicago, IL 60602
Via First Class Mail

County of Cook
dba Cook County Land Bank Authority
69 W. Washington St., Suite 2938
Chicago, IL 60602
Via First Class Mail

Madison-Laramie Self Storage, L.L.C.
c/o David Dunkin
73 Locust Road
Winnetka, IL 60093
Via First Class Mail

Department of the Treasury
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101
Via First Class Mail

Internal Revenue Service
Mail Stop 5014CHI
230 S. Dearborn Street, Room 2600
Chicago, IL 60604
Via First Class Mail

City of Chicago
Chicago Law Dept. – Bankruptcy
121 N. LaSalle St., Suite 400
Chicago, IL 60602

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re)	Chapter 11
)	
Madison-Laramie Self Storage LLC)	Case No. 18-01228
)	
Debtor.)	Judge Donald R. Cassling

MOTION FOR ENTRY OF FINAL DECREE

NOW COMES Madison-Laramie Self Storage LLC as debtor and debtor in possession (“Debtor”), by and through the undersigned attorneys, and moves this honorable Court for entry of a final decree in this confirmed Chapter 11 case, and in support thereof states as follows:

1. On January 16, 2018 (“Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. The Debtor is an Illinois limited liability corporation and owns and manages real property located at 5110-5114 W. Madison Street, Chicago, IL 60644 (the “Property”). The Debtor’s case was filed to avoid a tax sale of the Property.

3. On November 13, 2018, this Court entered an Order (the “Confirmation Order”) approving the Debtor’s Disclosure Statement and confirming the Debtor’s Plan of Reorganization dated September 5, 2018 (the “Plan”).

4. The Plan provides for, among other things, the following payments:

(a) Payment in full of allowed administrative claims;

(b) Payment of allowed Class 1 Claim of Cook County Tax Collector due and owing for the Property for tax years through and including 2017, but not including any sold real estate taxes, over a period of 5 years in monthly

payments of principal and interest at 5%. Payments are to commence on the Effective Date and monthly thereafter for a total of 60 payments.

(c) Payment of allowed Class 2 Claim for sold real estate taxes for the Property for 2006-2013, limited to the bid amount(s) for the sold taxes and not including any penalty, interest, fees or costs, in an amount equal to 50% of the bid amount payable over a period of 60 months commencing on the Effective Date. Any Class 2 Claims not filed on or before the Bar Date shall be disallowed and discharged and not entitled to distributions.

(d) Payment of allowed Class 3 Claims which consists of unsecured claims. These claims are to be paid in full within 120 days following the Effective Date.

5. The Effective Date of the Plan is defined as 30 days following the date on which the Confirmation Order becomes a final order – which in this case equates to December 27, 2018.

6. All payments that are due on the Effective Date have been paid or will be paid by December 18, 2018 including:

- (a) Administrative Claims – all administrative claims previously allowed have been paid in full.
- (b) Class 1 – Cook County filed a claim in the amount of \$36,577.93. Per the terms of the Plan the sum of \$690.00 shall be paid to Cook County on or before the Effective Date.
- (c) Class 2 – No claim was timely filed for sold taxes relating to the Property. As such, no payments are due as this claim will be discharged.

(d) Class 3 – no claims are currently due at this time pursuant to the terms of the Plan.

7. All other claims and motions have been resolved.

8. All payments currently due to the U.S. Trustee have been paid in full or shall be paid in full at the hearing.

9. Payments to administrative creditors and Class 1 claimant constitutes substantial consummation of the confirmed plan and this case should now be closed.

10. Notice of this Motion has been provided to (i) the Debtor; (ii) the UST; (iii) all known creditors of the Debtor and (iv) parties requesting notice via CM/ECF.

WHEREFORE, Madison-Laramie Self Storage LLC respectfully request that the Court enter a final decree and direct the Clerk of the Court to close this case.

MADISON-LARAMIE SELF STORAGE LLC

By: /s/ Miriam R. Stein
One of its attorneys

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